

TOP TEN HAZARDOUS WASTE GENERATOR VIOLATIONS

And How To Avoid Them

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Small Quantity Generators (SQGs)

Generates greater than 100 kg and less than
1000 kg HW in a month

OR

Accumulates greater than 1000 kg and less
than or equal to 6000 kg HW at any time

Memphis Area 2004 Inspections: 21

Large Quantity Generators (LQGs)

Generates greater than or equal to 1000 kg
HW in a month

OR

Generates greater than 1 kg acute HW in a
month

Memphis Area 2004 Inspections: 20

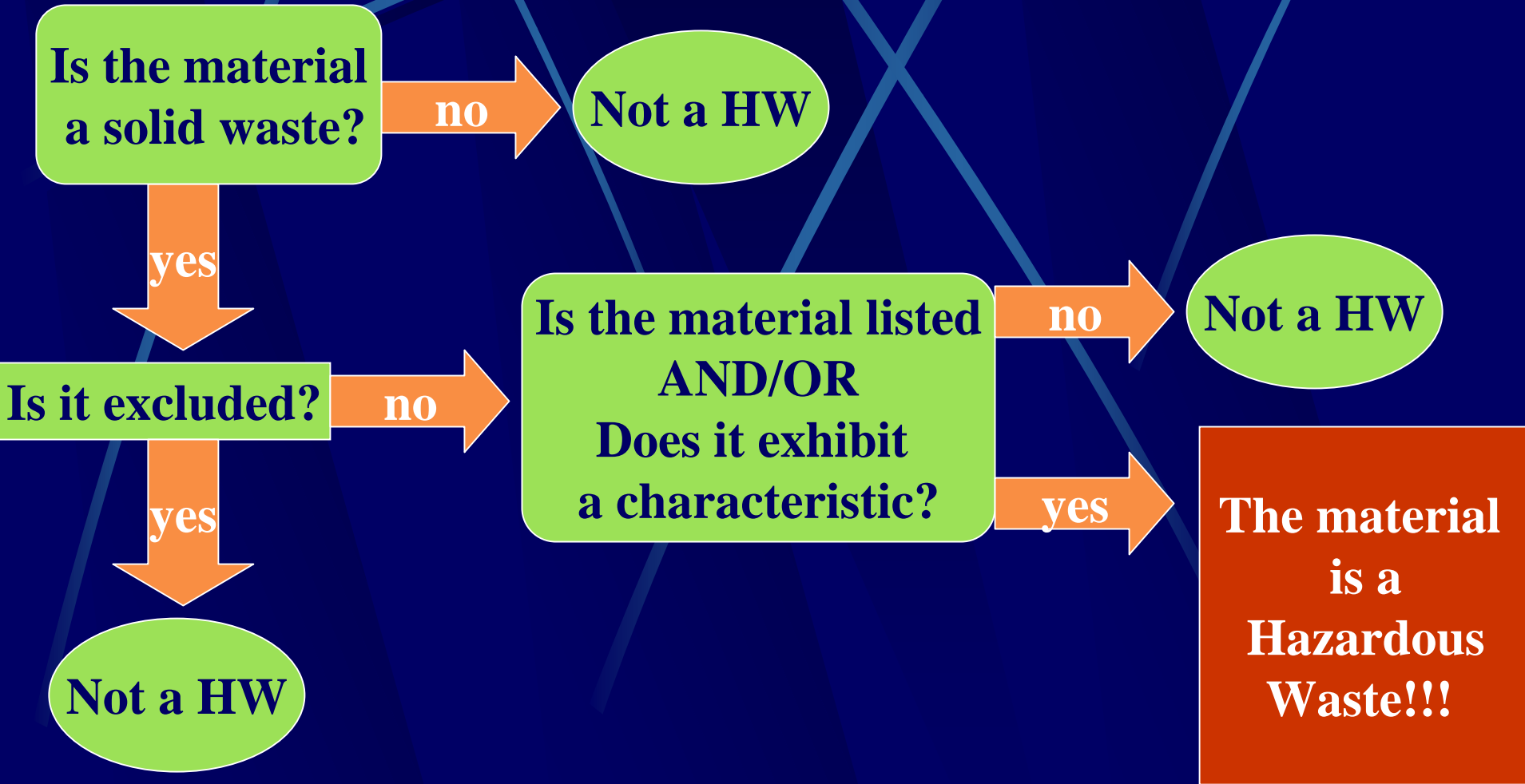
Failure to Make a Hazardous Waste Determination



- Is the material a solid waste?
- Is the material a hazardous waste?

Hazardous Waste Determination

START



Apply Analytical Methods OR Generator Knowledge

● Is the waste listed?

▸ P list

▸ F list

▸ U list

▸ K list

● Does the waste exhibit a characteristic?



Ignitable



Corrosive

Reactive



Toxic





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Hazardous Waste Determination

Avoid This Violation:

- **Make a determination on ALL waste generated on-site**
- **Treat unknown material as a HW during the determination process (label, close, date, etc.)**
- **Keep necessary documentation for both hazardous and non-hazardous waste**

Failure to Have a Hazardous Waste Reduction Plan On-Site



- **Required for Large and Small Quantity Generators**
- **Written Plan on-site within three years of first becoming a hazardous waste generator**

Hazardous Waste Reduction Plan

Some Required Elements

- A written policy signed by management
- Scope and objectives of the Plan
- An assessment and characterization of waste streams
- Specific quantitative goals

Hazardous Waste Reduction Plan

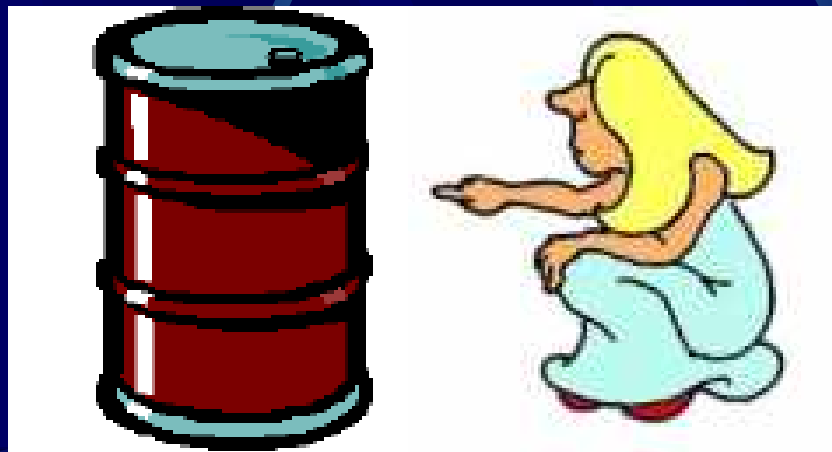
Avoid This Violation:

- Keep a copy on-site
- Update annually to ensure accuracy
- Management signature
- Review TCA 68-212-305 to ensure all applicable elements are included in the Plan



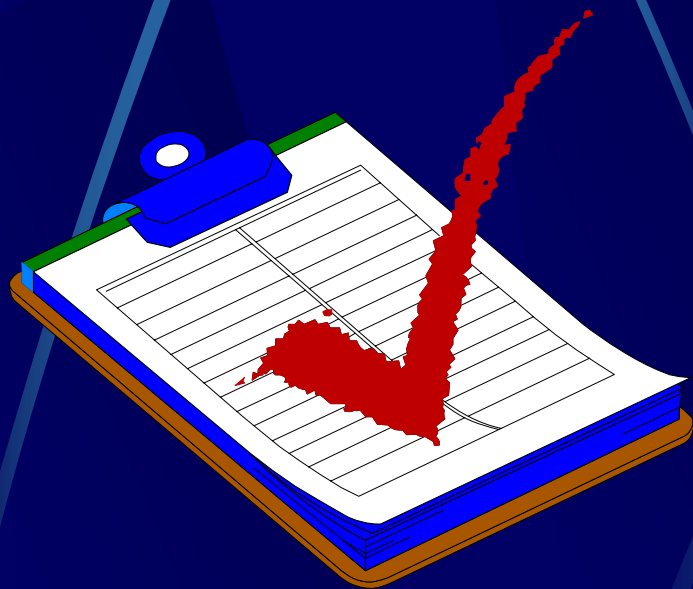
Failure to Perform Weekly Inspections of Hazardous Waste Storage Areas

Both Small Quantity Generators and Large Quantity Generators are required to perform a weekly inspection of the hazardous waste container storage areas





Weekly Inspection Logs



**Large Quantity
Generators are
required to
document weekly
inspections**



Weekly Inspections Avoid This Violation:

- **Perform the inspections on the same day every week**
- **Mondays and Fridays are not a good choice**
- **Have a back-up inspector**
- **Document inspections on an inspection log**

Contingency Planning Violations

Small Quantity Generator Requirements

- Designate an emergency coordinator and post contact information
- Post the location of emergency equipment
- Post emergency telephone numbers
- Ensure employees are familiar with emergency procedures



Contingency Planning Violations

Large Quantity Generator Requirements



- Written plan on-site and up to date
- List name, address and phone number (home and office) for designated emergency coordinator
- Submit to local authorities

Contingency Planning Avoid This Violation

- Designate an emergency coordinator
- Keep information up to date and on-site
- Ensure all required elements are included
- For LQGs, document submittals to local authorities

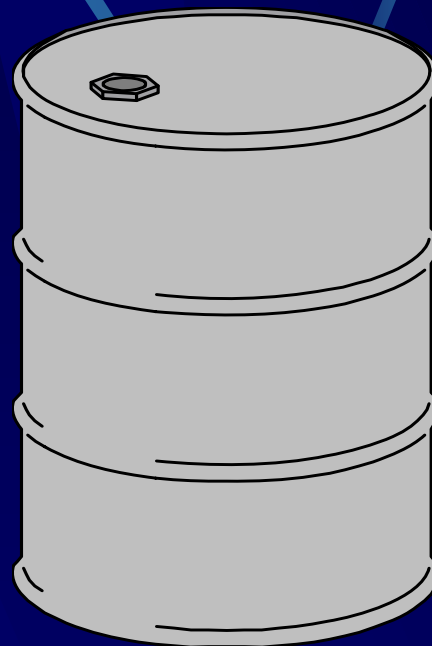


Satellite Accumulation Area (SAA) Labeling Violations

- “Hazardous
Waste”

OR

- Words describing
the container
contents





SAA Labeling

Avoid This Violation

- Review and understand the definition of a SAA
- Label your container once the first drop of HW is added to the container

Storage Area Labeling



**Containers in a
90 or 180 day
storage area
must be
marked with
the words
“HAZARDOUS
WASTE”**



Storage Area Labeling

Avoid This Violation

- Once 55-gallons of HW or 1 quart of acute HW is exceeded at a SAA, storage area labeling requirements apply after three days
- Ensure all HW containers in storage are marked “Hazardous Waste” during weekly inspections

Used Oil Labeling Violations

- For containers – the words used oil must be on the container
- For tanks – the words used oil must be on the tank



WASTE
SOLVENT

WASTE
OIL



WASTE
OIL

WASTE
OIL

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Used Oil Labeling

Avoid This Violation

- Understand the definition of used oil
- Any container or tank utilized to hold used oil should be labeled “Used Oil”
- Ensure fill pipes used to transfer used oil to a UST are marked “Used Oil”



Universal Waste Violations

A Small Quantity Handler of Universal Waste (accumulates less than 5000 kg) must manage that universal waste in a way that prevents releases to the environment.

Most Common Universal Waste Violations: Spent Batteries

- If universal waste batteries are in poor condition, they must be stored in a closed container
- Labeled “Universal Waste Batteries,” “Waste Batteries” or “Used Batteries”

Most Common Universal Waste Violations: Spent Lamps

- Universal waste lamps must be stored in a closed container
- Labeled “Universal Waste Lamps,” “Waste Lamps” or “Used Lamps”





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Universal Waste Avoid These Violations

- Understand the regulations for universal waste (1200-1-11-.12)
- Train employees on proper universal waste handling procedures

Open Container Violations



Containers holding hazardous waste must be closed when not adding or removing waste



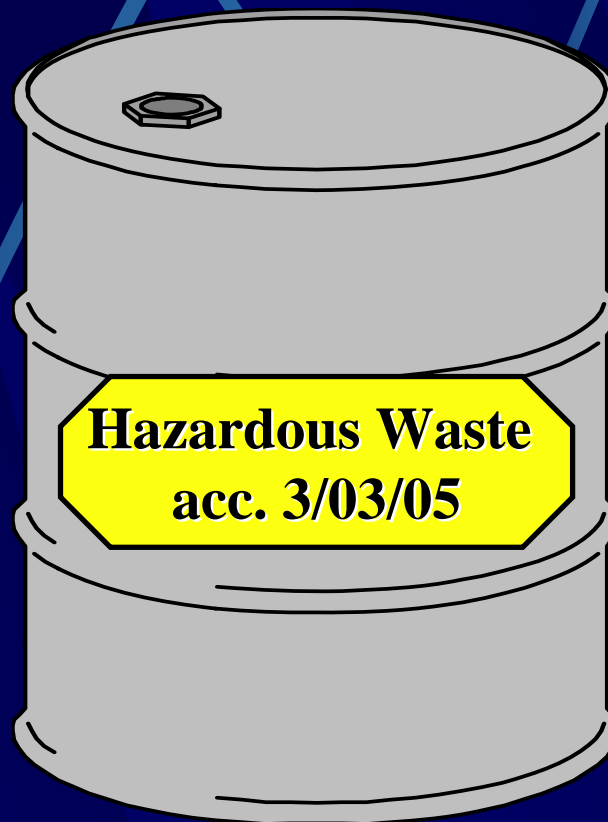
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Open Container Avoid This Violation

- Rule of Thumb – if the contents would spill if the container was overturned, then the container is considered open
- Close and latch funnels; screw in bungs; use drum rings and tighten bolts
- Train employees to close containers when not adding or removing waste

Storage Area Accumulation Date Violations

**Containers of HW
in a 90 or 180 day
storage area must
be marked with an
accumulation date**





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Storage Area Accumulation Dates Avoid This Violation

- Once 55-gallons of HW or 1 quart of acute HW is exceeded at a SAA, storage area dating requirements apply after three days
- Make sure all containers of HW in storage are marked with waste accumulation dates during weekly inspections

Top Ten Generator Violations

- 10 Failure to Make a HW Determination**
- 9 Failure to Have a Waste Reduction Plan**
- 8 Failure to Perform Weekly Inspections**
- 7 Contingency Plan Violations**
- 6 SAA Labeling Violations**
- 5 Storage Area Labeling Violations**
- 4 Used Oil Labeling Violations**
- 3 Universal Waste Violations**
- 2 Open Container Violations**
- 1 Storage Area Accumulation Date Violations**

In General.....

- Familiarize yourself with the regulations
- Know your generator classification
- Select the best storage method for your HW
- Train employees so compliance is a team effort
- If unsure, ask for guidance

ANY QUESTIONS

